Bayer CropScience

03506663

Attention: Celimar Valent-Rodriguez, Ph.D
Division of Nuclear Material Safety
U.S. Nuclear Regulatory Commission
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Reference: **U.S. NRC License No. 47-04373-01 Renewal Application**

December 4, 2015

Bayer CropScience
Institute Site
P. O. Box 1005
Institute, WV 25112
Tel. 304 767 6680
Fax 304 767 6879

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In response to your e-mail dated November 25, 2015 we have changed Appendix G of our Radiation Protection Procedure to address your comments. A copy of the new Appendix G is attached for your review. In addition, this site only has two Cesium – 137 sources each at 15.00 mCi which is well below the 37 GBq limit for each source. I have attached the latest wipe test for these sources as evidence. Please let me know if there is any further information you may need.

Sincerely,

Douglas Nye
HSE Representative & RSO
Institute Site

Attachments

588934

APPENDIX G
Removal of a Sourceholder Procedure

Removal of the source holder and repairs are to made by the manufacturer or their authorized agent. The RSO or RSO alternate must verify that proper procedures are being followed during removal of the source holder or during repairs.

Safe Handling Procedure

A. Physical Exam of Unit
   a. Integrity of external surface. External surface is smooth and has not been damaged
      1) Corroded and rusted units which have been in service under extreme environmental conditions may require special removal and shipping/handling procedures
   b. Shutter mechanism OFF and locked. Shutter must be closed and locked in the OFF position (see lockout procedure, Appendix D)

B. Radiation Survey
   a. Ensure survey meter is calibrated and operable
   b. Survey unit omni-directionally at 1 foot before starting removal
      1) Radiation field should be comparable to installation survey or less than 5 mrem/hr at 1 foot omni-directionally

C. Leak Test
   a. Perform leak test if unit is being prepared for shipment
   b. See leak test instructions in site procedure

4241 Allendorf Drive
Cincinnati, OH 45209
Phone (513) 272-0131 Fax (513) 272-0133

Leak Test Report

Customer ID: 1171

Email: douglas.nye@bayer.com

Customer Information:	Douglas Nye	Analyzed By:	Matt Wilfo
	Bayer CropScience	Equipment No.	NS-0095
	P.O. Box 1005	Calibration Due:	09/12/2016
	Institute, WV 25112	Analysis Date:	10/02/2015
		Sources Analyzed:	4

Ohio Administrative Code (OAC) - 3701:1-38-24
(E) A sealed source shall be considered to be leaking if the presence of one hundred eighty -five becquerels (0.005 microcurie) or more of removable contamination on any test sample is identified.

Serial #	Isotope	mCi	Source Holder	Customer Tag #	Test Result	Test Date	Test Interval	Next Test Date
U4830	Ni-63	15.00	G2397A	Agilent 6890 Electron Capture Detector	< 0.005µCi	09/10/2015	6 Months	03/10/2016
U4825	Ni-63	15.00	G2397A	Agilent 6890 Electron Capture Detector	< 0.005µCi	09/10/2015	6 Months	03/10/2016
0525CG	Cs-137	15.00	SH-F1	LX-4317-1	< 0.005µCi	09/10/2015	3 Years	09/10/2018
67699	Cs-137	10.00	SH-F1	LX-4318-3	< 0.005µCi	09/10/2015	3 Years	09/10/2018

Analyzed By

10/2/2015
Analyzed Date

Reviewed By

10-7-15
Reviewed Date